

Section 1. Registration Information

Source Identification

Facility Name:	Brook Warehousing Corporation
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Voluntary update (not described by any of the above reasons)
Description:	
Receipt Date:	11-Jun-2019
Postmark Date:	11-Jun-2019
Next Due Date:	11-Jun-2024
Completeness Check Date:	11-Jun-2019
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	

Facility Identification

EPA Facility Identifier:	1000 0021 8588
Other EPA Systems Facility ID:	NJR000047720
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	18 Van Veghten Drive
Street 2:	
City:	Bridgewater
State:	NEW JERSEY
ZIP:	08807
ZIP4:	
County:	SOMERSET

Facility Latitude and Longitude

Latitude (decimal):	40.557222
Longitude (decimal):	-74.586667
Lat/Long Method:	Address Matching - House Number
Lat/Long Description:	Administrative Building
Horizontal Accuracy Measure:	1
Horizontal Reference Datum Name:	North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name:	Brook Warehousing Corporation
Operator Phone:	(908) 809-1701

Mailing Address

Operator Street 1:	P.O. Box 928
Operator Street 2:	
Operator City:	Manville
Operator State:	NEW JERSEY
Operator ZIP:	08835
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	John Auger
RMP Title of Person or Position:	VP Engineering & Regulatory Comp.
RMP E-mail Address:	jauger@brookwarehouse.com

Emergency Contact

Emergency Contact Name:	John Auger
Emergency Contact Title:	VP Engineering & Regulatory Comp.
Emergency Contact Phone:	(908) 809-1701
Emergency Contact 24-Hour Phone:	(908) 229-1090
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	jauger@brookwarehouse.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	www.brookwarehouse.com

Local Emergency Planning Committee

LEPC:	Bridgewater Twp LEPC
-------	----------------------

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	25
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	

CAA Title V:

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) 11-Apr-2019
Date:

Last Safety Inspection Performed By an External Agency: State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name: John Auger
Preparer Phone: (908) 809-1701
Preparer Street 1: 22 Van Veghten Drive
Preparer Street 2:
Preparer City: Bridgewater
Preparer State: NEW JERSEY
Preparer ZIP: 08807
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID: 1000100266
Description: Chemical Storage
Process Chemical ID: 1000125599
Program Level: Program Level 3 process
Chemical Name: Phosphorus oxychloride [Phosphoryl chloride]
CAS Number: 10025-87-3
Quantity (lbs): 24300
CBI Claimed:
Flammable/Toxic: Toxic

Process ID:	1000100266
Description:	Chemical Storage
Process Chemical ID:	1000125600
Program Level:	Program Level 3 process
Chemical Name:	Phosphorus trichloride [Phosphorous trichloride]
CAS Number:	7719-12-2
Quantity (lbs):	24300
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000100266
Process NAICS ID:	1000101511
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000080228

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Release Duration (mins):	60
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	Yes
Berms:	Yes
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000085624

Percent Weight:	
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	Yes
Berms:	Yes
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Toxic Alter ID: 1000085623

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	Yes
Berms:	Yes
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	

Scrubbers:

Emergency Shutdown:

Other Type:

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000105530
Chemical Name:	Phosphorus trichloride [Phosphorous trichloride]
Flammable/Toxic:	Toxic
CAS Number:	7719-12-2

Process ID:	1000100266
Description:	Chemical Storage
Prevention Program Level 3 ID:	1000084661
NAICS Code:	49319

Prevention Program Chemical ID:	1000105529
Chemical Name:	Phosphorus oxychloride [Phosphoryl chloride]
Flammable/Toxic:	Toxic
CAS Number:	10025-87-3

Process ID:	1000100266
Description:	Chemical Storage
Prevention Program Level 3 ID:	1000084661
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	27-Mar-2019
---	-------------

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	16-Jun-2018
---	-------------

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	16-Jun-2018

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	
Corrosion:	Yes
Overfilling:	
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	Drum Leak

Process Controls in Use

Vents:	
Relief Valves:	
Check Valves:	
Scrubbers:	
Flares:	
Manual Shutoffs:	
Automatic Shutoffs:	
Interlocks:	
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	Berms

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:

Perimeter Monitors:

None:

Other Monitoring/Detection System in Use: Visual Inspections

Changes Since Last PHA Update

Reduction in Chemical Inventory: Yes

Increase in Chemical Inventory:

Change Process Parameters:

Installation of Process Controls:

Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended: Yes

None:

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 27-Mar-2019

Training

Training Revision Date (The date of the most recent review or revision of training programs): 27-Mar-2019

The Type of Training Provided

Classroom: Yes

On the Job: Yes

Other Training:

The Type of Competency Testing Used

Written Tests: Yes

Oral Tests: Yes

Demonstration: Yes

Observation: Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 27-Mar-2019

Equipment Inspection Date (The date of the most recent equipment inspection or test): 11-Jun-2019

Equipment Tested (Equipment most recently inspected or tested):

Forklifts

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

01-May-2019

Change Management Revision Date (The date of the most recent review or revision of management of change procedures):

27-Mar-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

10-Jun-2019

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):

11-Apr-2019

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

11-Apr-2019

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

01-Feb-2019

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

01-Feb-2019

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

27-Mar-2019

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):

27-Mar-2019

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

27-Mar-2019

Contractor Safety Performance Evaluation Date
(The date of the most recent review or revision of
contractor safety performance):

21-Jun-2018

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 25-Jan-2019

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 18-Dec-2018

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Bridgewater LEPC

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (908) 722-4111

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify):

Executive Summary

The Management of Brook Warehousing Corporation is committed to a practice that promotes a sense of concern and responsibility for the environment and safety of their associates. The facility promotes safety and environmental responsibility by implementing systems that protect worker safety and the environment.

(a) Employees that are involved in the handling of these substances are trained in accordance with procedures developed under the State of New Jersey's Toxic Catastrophe Prevention Act (N.J.S.A. 13:1K-19 et seq). Brook Warehousing Corporation personnel are trained to follow emergency response plans for releases of covered materials.

(b) The stationary source consists of a 100,000 ft² warehouse. The regulated substances are kept in an enclosed, secured room that is located in the center of the building. The regulated substances consist of 55 gallon drum quantities of phosphorous oxychloride and phosphorous trichloride.

(c) The drums are stored in a separate room that is secured with access limited to EPA-RMP/NJ-TCPA trained/certified individuals only. There is containment within the warehouse building. This provides layers of protection in the event of a drum leak.

(d) There have been no accidental releases involving the regulated substances within the past five(5) years at this facility that resulted in deaths, injuries, or significant property damage on site, nor known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage at the facility.

(e)The facility's emergency response plan, along with the agreement with the Local Emergency Planning Committee, systematically controls emergency response activities and promotes worker and environmental safety, as well as public health. In addition, Brook Warehousing Corporation has an emergency response agreement with a response contractor, AWT Environmental.

(f) Brook Warehousing Corporation has an aggressive safety program. All new employees receive training in material handling and chemical safety before beginning work at the facility with hazardous substances. Brook Warehousing Corporation conducts refresher training on topics including, but not limited to, spill response, chemical safety, material handling, and hazardous materials transportation. Audits of the program are conducted periodically to ensure program effectiveness.